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April 27, 2016

By ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square, Room 415
New York, NY 10007

Re: *United States of America v. John W. Ashe, et al.*,
Docket No. 15 Cr. 706 (VSB)

Dear Judge Broderick:

Pursuant to Local Criminal Rule 1.2 and Local Civil Rule 1.4, please accept this letter, in lieu of a more formal motion, seeking immediate permission for Sils Cummis & Gross P.C. (the "Firm") to withdraw as counsel for Ambassador John W. Ashe in the above matter.

Our sole reason for making this application, which is based on extensive discussions with Ambassador Ashe (who has been under home detention since October 2015 and has not been able to secure employment), is that he has been unable to pay our Firm's outstanding legal invoices for the past several months, and given that he has informed us that he has already exhausted all his available financial resources, he is not in a position to pay the Firm's past and ongoing legal fees. It is my understanding that Ambassador Ashe will apply for Court-appointed counsel.

Although the Indictment was filed in or about late October 2015, the case itself is still at a very early stage, with the Government considering filing a superseding Indictment (which may or may not include additional charges against Ambassador Ashe). While discovery from the Government has been proceeding, a schedule for substantive motions has not yet been set by the Court, pending the superseding Indictment. No motions are pending at this time. No tentative trial date has been set. Permitting my firm to withdraw will have little or no effect on the legal proceedings in this case. The Court granted my April 25, 2016 request for a two-week

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adjournment of the scheduled May 5, 2016 conference and scheduled the next conference for May 27, 2016 at 3 p.m.

I am available at the Court's earliest convenience to appear and answer any question Your Honor may have.

Respectfully submitted,

/s/ Hervé Gouraige
Hervé Gouraige

Cc: Ambassador John W. Ashe (by Email)
All Counsel (by ECF)